

STATE OF NEW JERSEY
DIVISION OF GAMING ENFORCEMENT
PETITION No 0661201

IN THE MATTER OF THE)
PETITION OF REVEL)
REVEL ENTERTAINMENT GROUP)
LLC, FOR AN OPERATION)
CERTIFICATE TO BE ISSUED)
PURSUANT TO N.J.S.A. 5:12-96.)

**CONDITIONAL
OPERATION
CERTIFICATE**

WHEREAS, Revel Entertainment Group LLC, ("Revel") filed, on January 12, 2012, a petition, which petition was thereafter subject to multiple amendments, with the Division of Gaming Enforcement ("Division") seeking the issuance, pursuant to N.J.S.A. 5:12-82, of a casino license; and,

WHEREAS, Revel is required to obtain an Operation Certificate prior to commencing casino operations, which certificate requires compliance with all legal and regulatory provisions, pursuant to N.J.S.A. 5:12-96; and,

WHEREAS, Revel, on March 6, 2012, filed a Petition, which petition was thereafter the subject of several technical amendments, PRN #0661201, seeking the issuance of an Operation Certificate, pursuant to N.J.S.A. 5:12-96,

WHEREAS, Revel is required to arrange the facilities of its casino in a manner to promote security and which complies with the regulations of the Division pursuant to N.J.S.A. 5:12-98(a); and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to the arrangement and configuration of the casino facility, as stated in Appendix "A" which is incorporated herein; and,

WHEREAS, Revel is required to include within its casino hotel facility a Closed Circuit Television ("CCTV") system, which system shall be designed according to specifications approved by the Division, pursuant to N.J.S.A. 5:12-98(b); and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to the CCTV system as stated in Appendix "B" which is incorporated herein; and,

WHEREAS, Revel is required to create, maintain and file with the Division documents detailing its organizational structure, which documents are intended to ensure that procedures are followed and supervised by appropriate individuals having no incompatible functions and to prepare and file adequate and effective internal procedures which establish a consistent overall system of administrative and accounting controls and which conform to generally accepted accounting principles, pursuant to N.J.S.A. 5:12-99; and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to both the organizational structure and administrative and accounting controls of Revel, as stated in Appendix "C" which is incorporated herein; and,

WHEREAS, Revel is required to possess gaming equipment acquired from appropriately licensed entities, and to conduct authorized gaming activity using only said equipment, pursuant to N.J.S.A. 5:12-100; and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to the gaming equipment Revel has represented it will utilize in the conduct of casino gaming, as stated in Appendix "D" which is incorporated herein; and,

WHEREAS, Revel is required to establish procedures and policies related to the extension of credit, pursuant to N.J.S.A. 5:12-101; and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to the extension and suspension of credit to patrons, and related reporting requirements, as stated in Appendix "E" which is incorporated herein; and,

WHEREAS, Revel is required to establish procedures and policies related to the management and reporting of its complimentary programs, pursuant to N.J.S.A. 5:12-102; and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to the issuance or distribution of complimentary goods and services to patrons or pursuant to complimentary programs, as stated in Appendix "F" which is incorporated herein; and,

WHEREAS, Revel is required, to obtain a Casino Hotel Alcoholic Beverage ("CHAB") license to purchase, possess, store, sell and otherwise distribute for consumption alcoholic beverages, pursuant to N.J.S.A. 5:12-103; and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to the purchase, possession, storage, and sale of alcoholic beverages, as stated in Appendix "G" which is incorporated herein; and,

WHEREAS, Revel is required to submit to the Division an operating plan regarding implementation of the provisions related to Equal Employment and Business Opportunity, pursuant to N.J.S.A. 5:12-134(c); and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to Revel's commitment to Equal Employment and Business Opportunity, as stated in Appendix "H" which is incorporated herein; and,

WHEREAS, Revel is required to prepare and file adequate and effective internal control procedures to implement the requirements of the statutory provisions related to the exclusion and/or self-exclusion of persons, pursuant to N.J.S.A. 5:12-71, and the regulations promulgated thereunder; and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, related to the exclusion and self-exclusion of certain patrons, as stated in Appendix "I" which is incorporated herein; and,

WHEREAS, Revel is required to prepare and file adequate and effective internal control procedures to implement the regulatory requirements related to the persons and entities with which it transacts business pursuant to N.J.S.A. 5:12-92, and the regulations promulgated thereunder; and,

WHEREAS, the Division has considered the law, the submissions of Revel and has conducted all necessary reviews, including on-site tests and inspections, if appropriate, of those systems, procedures and policies implemented by Revel to insure business transactions are conducted with properly licensed or registered entities, as stated in Appendix "J" which is incorporated herein.

I **HEREBY ORDER** that REVEL ENTERTAINMENT GROUP LLC, be granted a **CONDITIONAL OPERATION CERTIFICATE** subject to the following conditions:

1) Revel shall satisfy all conditions set forth in the several appendices prior to commencing gaming operations.

2) Revel, having been issued a casino license on March 26, 2012, shall be authorized to conduct gaming during a test period which shall be as follows:

a) March 28, 2012, commencing at 4:00 p.m, and continuing until 10:00 p.m.

b) March 29, 2012, commencing 10:00 a.m, and continuing until 10:00 p.m.


c) March 30, 2012, commencing at 4:00 p.m, and continuing until 10:00 p.m.

d) Such additional testing as the Division may determine is necessary and proper.

3) During the test period set forth in Paragraph 2, above, Revel shall demonstrate to the satisfaction of the Division that it can effectively and efficiently conduct gaming operations and is otherwise fully prepared to receive and entertain the public.

4) Revel shall comply with all State, County and Municipal laws, regulations, ordinances and rulings.

Dated: March 27, 2012



DAVID L. REBUCK
DIRECTOR

CASINO FLOOR

Statute and Regulations:

N.J.S.A. 5:12-98(a) requires each casino licensee to arrange its casino in a manner to provide optimum security for casino operations. To this end, casino licensees are required to file a floor plan of its proposed casino configuration with the Division. The floor plan is to be certified by the architect and be reviewed and approved by the Department of Community Affairs with regard to public safety. The details of the floor plan are set forth in N.J.A.C. 13:69C-7.3 and include slot zone designations, gaming pit designations, jackpot and voucher redemption machines, count rooms, cage areas with cashier positions, storage areas for chips cards and dice, and other casino specific features. The regulations, at N.J.A.C. 13:69E-1.27, also set forth certain requirements pertaining to slot machines, including but not limited to, the density of slot machines on the overall casino floor and the arrangement or configuration of slot machine zones,

REVEL ACTION and COMPLIANCE:

On March 6, 2012, Revel submitted to the Division a floor plan which was certified by its architect to be an accurate depiction of the casino floor design and which had been submitted to, and approved and sealed by, the Department of Community Affairs. Said floor plan was drawn to a 1/16th inch scale and approved by the Division. Thereafter, several revisions were made to the initial submission reflecting certain technical amendments.

The floor plan submitted by Revel designates 130,000 square feet as casino gaming space. At its opening, Revel has represented that it would offer 1,090 qualified sleeping units (QSUs) which, pursuant to N.J.S.A. 5:12-83, would permit Revel to operate 110,000 square feet as casino gaming space. By petition, PRN 0381201, Revel sought approval to commence operations with 130,000 square feet of casino space and represented that it would add 309 additional QSUs by May 31, 2012. On February 22, 2012, the Director issued an Order granting the relief requested by Revel. Accordingly,

Revel is authorized to operate a casino facility containing 130,000 square feet of casino gaming space.

The floor plan submitted by Revel includes a depiction of the table game locations and the distribution of table games in gaming pits, as required by N.J.A.C. 13:69C-7.3(b) 2 and 3.

The floor plan submitted by Revel includes a depiction of the slot zone locations and the number and designation of the slot machines within each zone, as required by N.J.A.C. 13:69C-7.3(b)10 and 11.

Revel has submitted a casino floor plan configuration which allocates 79,820 square feet of casino space to slot machines. This allocation represents 61.4% of the total casino gaming space and, thus, is in compliance with the requirement of N.J.A.C. 13:69E-1.27(d).

Revel has represented that it will not be offering either keno (N.J.A.C. 13:69C-7.3(b)21) or casino simulcasting (N.J.A.C. 13:69C-7.3(b)23) at the time of opening. Accordingly, no designation of floor space for these forms of gaming activity was included in its submissions.

Revel has represented that it will not be utilizing any coin or tokens at the time of opening (N.J.A.C. 13:69C-7.3(b)7 and 17). Accordingly, no designation of floor space for a hard count room, or a designation of a hard count pick-up routes, was included in its submissions.

Revel has represented that it will offer a smoke-free casino environment at the time of opening. Accordingly, no analysis of smoking areas has been undertaken.

Revel has represented on its floor plan the locations of several television screens as required by N.J.A.C. 13:69C-7.3(b)22.

Revel has submitted its drop box and slot cash storage box pick up routes to and from the casino gaming areas and the main cage. The Division has reviewed the submission and deemed the routes to be adequate.

Revel has demonstrated to the satisfaction of the Division, that the design, construction and operation of its pneumatic tube system is secure and functional.

Revel has demonstrated to the satisfaction of the Division, that the design, construction and operation of its mantraps are secure and functional.

Revel has demonstrated to the satisfaction of the Division, by inspection, test or otherwise, that the design and construction of its main cage and any satellite cages, including provisions for the security of the cage or satellite cage, complies with the requirements of N.J.A.C. 13:69D-1.14, and N.J.A.C. 13:69C-7.3(b)6 and 16.

Revel has demonstrated to the satisfaction of the Division, by inspection, test or otherwise, that the areas in which playing cards and dice are stored, and the area at which such items are destroyed, are secure and functional, as required by N.J.A.C. 13:69C-7.3(19).

Conditions and Exceptions:

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-98(a), N.J.A.C. 13:69C-7.3 and N.J.A.C. 13:69E-1.27 and the Division's inspection, test or other review, the arrangement and configuration of the facility in a manner designed to provide optimum security for casino operations is APPROVED by letter dated March 26, 2012, subject to the following conditions and/or exceptions:

1. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its cashier positions in its main cage and any satellite cages are secure and include CCTV coverage, as required by N.J.A.C. 13:69C-7.3(8), prior to any test period.
2. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the design and construction of its soft count room, and the equipment therein, is secure and functional, as required by pursuant to N.J.A.C. 13:69D-1.32, and N.J.A.C. 13:69C-7.3(b)9, prior to any test period.
3. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the design, construction and operation of its armored car bay and the route(s) to and from the armored car bay and the main cage are secure and provide for surveillance coverage prior to any test period.
4. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that each emergency exit from the casino floor has a functional audible alarm system, as required by N.J.A.C. 13:69C-6.2(a)3, prior to any test period.
5. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.



State of New Jersey

Chris Christie
Governor

Kim Guadagno
Lt. Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Jeffrey S. Chiesa
Attorney General

David Rebuck
Director

March 26, 2012

Ms. Lynne Levin Kaufman, Esq
Cooper Levenson April Niedelman & Wagenheim, P.A.
1125 Atlantic Avenue
Atlantic City, NJ 08401

Dear Ms. Kaufman:

The staff of the Division of Gaming Enforcement ("Division") has received Petition #0661201 filed on behalf of Revel Entertainment Group, LLC Casino by the law firm of Cooper Levenson dated March 6, 2012, and an amendment to Petition #0661201 dated March 23, 2012 seeking approval for an Operation Certificate pursuant to N.J.S.A. 5:12-96.

As part of obtaining such Operation Certificate, and as required by N.J.A.C. 13:69C 7.3(a), a plan of Revel's casino floor (the "Plan") was submitted in the petition and this segment was reviewed by the Division's Regulatory Enforcement Bureau.

Revel has filed Petition #0121202 with the Casino Control Commission seeking a casino license.

In addition to the narrative in Petition #0661201, Revel submitted an Operation Plan ("Plan") of their casino room for review, as depicted in an architectural drawing labeled OP-1 (Exhibit 1) dated March 5, 2012, and as amended thereafter, prepared by Kimberly McCarron, RA, License #AI-16521 of SOSH Architects.



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The petitioner's "Plan" proposes and depicts the location of the following;

A casino floor that shall consist of thirteen (13) slot zones labeled AA through MM. The slot zones, the number of slot machines and slot stools in each zone are as followed:

- Slot Zone 'AA' will be comprised of (282) slot machines and stools.
- Slot Zone 'BB' will be comprised of (251) slot machines and (247) stools.
- Slot Zone 'CC' will be comprised of (241) slot machines and (240) stools.
- Slot Zone 'DD' will be comprised of (150) slot machines and stools.
- Slot Zone 'EE' will be comprised of (107) slot machines and stools.
- Slot Zone 'FF' will be comprised of (63) slot machines and stools.
- Slot Zone 'GG' will be comprised of (297) slot machines and stools.
- Slot Zone 'HH' will be comprised of (85) slot machines and stools.
- Slot Zone 'II' will be comprised of (173) slot machines and stools.
- Slot Zone 'JJ' will be comprised of (58) slot machines and stools.
- Slot Zone 'KK' will be comprised of (221) slot machines and stools.
- Slot Zone 'LL' will be comprised of (198) slot machines and stools.
- Slot Zone 'MM' will be comprised of (313) slot machines and stools.

Total number of slot machines will be **2439** and total of slot stools will be **2432**.

In addition, the casino floor shall have twenty five (25) Ticket Redemption machines and five (5) Quick-Jack machines. They are listed in the following slot zones.

Lynne Levin Kaufman

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- Slot Zone 'AA' will contain (3) Ticket Redemption machines, labeled TRAA07, TRAA08 and TRAA09, and (1) Quick-Jack machine labeled QJAA02.
- Slot Zone 'BB' will contain (1) Ticket Redemption machine, labeled TRBB10 and (1) Quick-Jack machine labeled QJBB03.
- Slot Zone 'CC' will contain five (5) Ticket Redemption machines, labeled TRCC11 through TRCC15.
- Slot Zone 'DD' will contain one (1) Ticket Redemption machine, labeled QJDD04.
- Slot Zone 'EE' will contain one (1) Ticket Redemption machine, labeled TREE17.
- Slot Zone 'GG' will contain three (3) Ticket Redemption machines, labeled TRGG18, TRGG19 and TRGG20 and one (1) Quick-Jack machine labeled QJGG05.
- Slot Zone 'HH' will contain one (1) Ticket Redemption machine, labeled TRHH23.
- Slot Zone 'II' will contain two (2) Ticket Redemption machines, labeled TRII21 and TRII22.
- Slot Zone 'KK' will contain two (2) Ticket Redemption machines, labeled TRKK24 and TRKK25.
- Slot Zone 'LL' will contain three (3) Ticket Redemption machines, labeled TRLL01, TRLL02 and TRLL03.
- Slot Zone 'MM' will contain Three (3) Ticket Redemption machines, labeled TRMM04, TRMM05 and TRMM06 and one (1) Quick-Jack machine labeled QJMM01.

A casino floor that shall consist of twelve (12) gaming pits labeled Pit 1 through Pit 11 and Pit 13. The gaming pits shall consist of the following table game mix.

- **Pit 1** will be comprised of (10) blackjack tables, designated as locations BJ0101 through BJ0110.
- **Pit 2** will be comprised of (13) table games. The table game mix is as follows: (6) blackjack tables designated as locations BJ0204 through BJ0209, (4) mini-baccarat tables, designated as locations MB-0201, MB-0202, MB-0211, and MB-0212, (2) pai gow poker tables, designated as PP-0203 and PP-0210, and (1) Sabre Multi-Win Roulette with (12) seats. A table game alternate configuration is proposed in OP-01, designated as Alternate #1, which removes the Sabre Multi-Win Roulette table thereby reducing (1) table game from this pit.
- **Pit 3** (Ultra Lounge) will be comprised of (7) table games. The table game mix is as follows: (4) blackjack tables, designated as locations BJ-0302 through BJ-0305, (1) roulette table and wheel, designated as RO-0301, (2) mini-baccarat tables, designated as MB-0306 and MB-0307.
- **Pit 4** will be comprised of (10) craps tables, designated as locations CR-0401 through CR-0410.
- **Pit 5** will be comprised of (8) blackjack tables, designated as locations BJ-0501 through BJ-0508.
- **Pit 6** will be comprised of (6) blackjack tables, designated as locations BJ-0601 through BJ-0606.
- **Pit 7** will be comprised of (12) blackjack tables, designated as locations BJ-0701 through BJ-0712.
- **Pit 8** will be comprised of (12) table games. The table game mix is as follows: (2) blackjack tables, designated as BJ-0802 and BJ-0811, (8) roulette tables, designated as RO-0803 through RO-0810, (2) Spanish-21 tables, designated as SP-0801 and SP-0812.
- **Pit 9** will be comprised of (12) table games. The table game mix is as follows: (3) Let-it-Ride tables, designated as locations LR-0901, LR-0902 and LR-0911, (1) Big-Six table, designated as BS-0912, (2) Four-Card Poker tables, designated as FP-0903 and FP-0910, and (6) Three-Card Poker tables, designated as TP-0904 through TP-0909.
- **Pit 10** will be comprised of (15) table games. The table game mix is as follows: (14) Digi-Deal units, designated as BB-1034 through BB1047, and (1) Sabre Multi-Win Roulette with (12) seats. A table game alternate configuration is

proposed in OP-01, designated as Alternate #2, which removes the Sabre Multi-Win Roulette table, thereby reducing (1) table game from this pit.

- **Pit 11** will be comprised of **(8)** blackjack tables, designated as locations Bj-1101 through BJ-1108.
- **Pit 13** will be comprised of **(37)** poker tables, designated as PO-1301 through PO-1337.

The "Plan" includes a closed circuit television system (CCTV). Each CCTV camera, with its type and camera number as depicted on OP-01 as follows:

- 965 total cameras with their location numbers are depicted in the "Plan" of which 340 are pan, tilt, and zoom (PTZ) cameras and 625 are fixed cameras.

The "Plan" includes a physical structure known as a cashier's main cage which includes segregated areas for the main bank, check bank, chip bank and cashier windows including window numbers. The "Plan" also includes a satellite cage and a poker cage.

The "Plan" includes a room to be known as a "soft count room" designed and used for the counting the contents of table drop boxes, slot cash storage boxes and ticket redemption boxes.

The "Plan" includes a separate area from the main cage and satellite cages for the storage of gaming chips to be known as the "soft count chip storage area".

The "Plan" includes an area for the storage of playing cards and dice.

The petitioner has addressed, by an amendment to the petition filed on March 23, 2012, each television screen that is intended for public viewing and is visible on or from the casino floor is depicted in the "Plan".

The summary of the statistical information and calculations is as follows:

1. The slot machine totals for OP-01 will be **2,439** and **2,432** slot stools.

2. The base plan for OP-01 will be **150** table games.
 - a. When Alternate Plan #1 for Pit 2 is in use, total table games will be reduced by (1) table.
 - b. When Alternate Plan #2 for Pit 10 is in use, total table games will be reduced by (1) table.
3. Casino Level Main Casino Area will be 121,452 sq. ft.
Casino Level Ultra Lounge will be 1,866 sq. ft.
Poker Room will be 6,682 sq. ft.
Total casino area will be **130,000** sq. ft.
4. The allowable slot coverage (90% of 130,000 sq. ft.) is 117,000 sq. ft.
5. The actual slot coverage is 79,820 sq. ft. which is **61.4%** of the total gaming area and within the allowable 90% for slot density.

Based on the Division's authority, the proposed plan for the casino floor area is hereby approved pursuant to N.J.A.C. 13:69C-7.3. This approval authorizes a casino room containing and consisting of:

Revel Casino

- One hundred and thirty thousand (130,000) square feet;
- Two thousand four hundred thirty-nine (2,439) slot machines and two thousand four hundred thirty-two (2,432) slot stools and one hundred fifty (150) table games as follows:
 - Fifty-six (56) Blackjack tables;
 - Ten (10) Craps tables;
 - Nine (9) Roulette tables and wheels;
 - Two (2) Pai Gow Poker tables;
 - Six (6) Mini Baccarat tables;
 - One (1) Big Six table;
 - Three (3) Let It Ride Poker tables;
 - Two (2) Spanish 21 tables;
 - Six (6) Three Card Poker tables;
 - Two (2) Four Card Poker tables;
 - Fourteen (14) DigiDeal tables;

- Two (2) Multi-Win Roulette tables; and
- Thirty-seven (37) Poker tables.

This approval becomes effective with the following conditions:

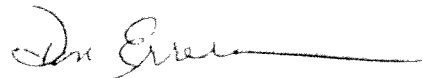
- A. The operational blueprints, reflecting any changes to the approved casino floor plan as described herein, be submitted to the Division's Regulatory Enforcement Bureau, casino licensee's security podium and the casino licensee's CCTV monitoring room;
- B. A Table Game, Roulette Wheel and Big Six Wheel inventory lists are submitted to the Division;
- C. A revised Slot Master List is submitted to the Division;
- D. Revel notifies the Division immediately in the event of any modification to the approvals granted herein;
- E. Revel complies with all requirements and conditions appended to approvals received from all involved agencies of government whose approvals are required in order for a Certificate of Occupancy for the general public to be issued including, but not limited to, the Department of Community Affairs and the local construction official; and
- F. Once construction of those areas indicated in the "Plan" have been completed, a satisfactory inspection of the gaming areas, related restricted areas and a review of CCTV coverage is completed by the Division's Regulatory Enforcement Bureau **prior to the proposed areas being used for gaming activity.**

Note: Revel has, by separate letter, indicated that the facility will be smoke free.

Lynne Levin Kaufman
March 26, 2012
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If you have any questions, please do not hesitate to contact me at 441-7557.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Errera", followed by a long horizontal line extending to the right.

Don Errera, Deputy Chief
Regulatory Enforcement Bureau

cc BEL/
DGE Intake
Chuck Kimmel
Lane Stebbins
C-62-12-005

OP-01 Statistical Slot analysis for Petition# 0661201

<i>Slot Zone</i>	<i>OP-01 Slots</i>	<i>OP-01 Stools</i>
AA	282	282
BB	251	247
CC	241	240
DD	150	150
EE	107	107
FF	63	63
GG	297	297
HH	85	85
II	173	173
JJ	58	58
KK	221	221
LL	198	196
MM	313	313
TOTALS	2,439	2,432

Closed Circuit Television System

Statute and Regulations:

N.J.S.A. 5:12-98 requires each casino to install a Closed Circuit Television ("CCTV") system for purposes of surveillance. The casino facility must also provide for a monitoring room for its surveillance department and a separate monitoring room for Division employees. The specific requirements for the equipment, in terms of specifications and functionality, are set forth in N.J.A.C. 13:69D-1.10, and include equipment to record, with time and date superimposed, activities within the casino facility. N.J.A.C. 13:69D-1.10 also delineates those areas of the casino which are to be monitored, requires a supplemental power supply and the development of a contingency plan, establishes a manpower standard for coverage and requires surveillance personnel to maintain records of surveillance activity. N.J.A.C. 13:69D-1.11(b)1 identifies the specific casino functions that are required to be monitored by the surveillance department. The CCTV system is subject to the approval of the Division to insure that the equipment specifications and the monitoring capabilities comply with the regulation.

Revel Action and Compliance

Revel has caused to be installed within its casino hotel facility a CCTV system as required by N.J.S.A. 5:12-98(b).

The Division has conducted an inspection of the CCTV system. The inspection compared, for accuracy and completeness, the floor plan camera designations to the actual camera designations as required by N.J.A.C. 13:69C-7.3(b)4. Revel has complied with the regulatory requirements.

Revel has provided within its casino hotel facility a location from which the Division and the New Jersey State Police can utilize the CCTV system to conduct observations and clandestine investigations. The space and equipment satisfy the standards of N.J.A.C. 13:69D-1.10(a).

The technical specifications of the individual cameras installed by Revel satisfy the operational requirements of N.J.A.C. 13:69D-1.10(b)1.

The technical specifications of the video recording equipment installed by Revel satisfies the requirements of N.J.A.C. 13:69D-1.10(b)2.

Revel has designated an area as a surveillance monitoring room as required N.J.A.C. 13:69D-1.10(g).

Revel has submitted for approval by the Division internal controls related to the operation of its CCTV system. Said internal controls include provision for surveillance logs, N.J.A.C. 13:69D-1.10(h), and a contingency plan, N.J.A.C. 13:69D-1.10(i). The Division has reviewed the submission and approved the internal controls.

Conditions and Exceptions

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-98(b), and N.J.A.C. 13:69D-1.10 and N.J.A.C. 13:69D-1.11(b)1, and the Division's inspection, test or other review, the CCTV system is APPROVED subject to the following conditions and/or exceptions:

1. Revel shall demonstrate, to the satisfaction of the Division, by test, inspection or otherwise, that the soft count room has audio capability as required by N.J.A.C. 13:69D-1.10(b)4, either prior to or during a test period.
2. Revel shall demonstrate, to the satisfaction of the Division, by test, inspection or otherwise, that the surveillance equipment and system is designed with continuous and sufficient lighting, as required by N.J.A.C. 13:69D-1.10(c), either prior to or during a test period.
3. Revel shall demonstrate, to the satisfaction of the Division, by test, inspection or otherwise, that the video recording equipment is functional as required by N.J.A.C. 13:69D-1.10(d), either prior to or during a test period.

4. Revel shall demonstrate, to the satisfaction of the Division, by test, inspection or otherwise, that it has installed camera equipment which is capable of recording patron transactions at the casino cage thus satisfying the standards of N.J.A.C. 13:69D-1.10(e), either prior to or during a test period.

5. Revel shall demonstrate, to the satisfaction of the Division, by test, inspection or otherwise, that the surveillance monitoring room, including the communications and alarm systems, satisfy the requirements of N.J.A.C. 13:69D-1.10(g), either prior to or during a test period.

6. Revel shall demonstrate, to the satisfaction of the Division, by test or otherwise, that the personnel assigned to the surveillance department are familiar with the department's policies and procedures, either prior to or during a test period.

7. Revel shall demonstrate, to the satisfaction of the Division, by test or otherwise, that the CCTV equipment and system is capable of performing the required surveillance functions (i.e. drop box pick-up) required by N.J.A.C. 13:69D-1.11(b)1 either prior to or during a test period.

8. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.

Accounting and Internal Controls

Statute and Regulations:

N.J.S.A. 5:12-99, relating to accounting and internal controls, requires a delineation of the licensee's table of organization, N.J.A.C. 13:69D-1.11(a), and a department by department narrative of the procedures by which each department will fulfill its responsibilities, N.J.A.C. 13:69D-1.11(b). Each casino licensee must then, pursuant to N.J.A.C. 13:69D-1.3, conduct its operations in a manner consistent with its internal controls.

N.J.S.A. 5:12-99 also requires casino licensees to develop and file with the Division a system of internal procedures and administrative and accounting controls which delineate the supervisory channels and the manner by which incompatible functions are eliminated. The procedures include, but are not limited to, the use of standard forms, the means by which the licensee will calculate revenue related information, the manner by which assets such as chips and currency will be transferred and accounted for within the casino facility and the means by which the security and integrity of gaming equipment is maintained.

Revel Action and Compliance

Revel has submitted a table of organization and that submission has been reviewed by the Division and was determined to be in compliance with N.J.A.C. 13:69D-1.11(a).

Revel has prepared and submitted internal controls for each department and function, where applicable, as required by N.J.A.C. 13:69D-1.11(b).

The internal control submission related to Revel's surveillance department, which submission requires the approval of the Division pursuant to N.J.A.C. 13:69D-1.3(d), has been reviewed by the Division and was approved by letter dated January 18, 2012.

The internal control submission related to the Revel's security department, which submission requires the approval of the Division, has been reviewed by the Division and was approved by letter dated March 13, 2012.

Conditions and Exceptions

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-99 and in consideration of the requirements of N.J.A.C. 13:69D-1.3, N.J.A.C. 13:69D-1.11(a) and N.J.A.C. 13:69D-1.11(b), the internal control

procedures and policies are APPROVED, subject to the following conditions and/or exceptions:

1. Revel shall submit to the Division its drop box and slot cash storage box pick up schedule, N.J.S.A. 5:12-99(a)5 and 7, prior to any test period.
2. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the personnel employed by Revel and assigned to a specific department are trained in and proficient with the policies and procedures of that specific department as set forth in the internal controls, either prior to or during a test period..
3. Revel shall submit to the Division prototypes or proofs of all forms to be utilized in the operation of its casino and hotel facility, prior to any test period.
4. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its personnel and systems can prepare and file all reports and notices required by the regulations and the internal controls, either prior to or during a test period.
5. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.



State of New Jersey

Chris Christie
Governor

Kim Guadagno
Lt. Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Jeffery L. Chisea
Attorney General

David Rebuck
Acting Director

January 18, 2012

Tony Weiss, Director of Surveillance
Revel Entertainment
500 Boardwalk
Atlantic City, New Jersey 08401

RE: Surveillance Submission:

Dear Mr. Weiss;

The staff of the Division of Gaming Enforcement's Regulatory Enforcement Bureau has reviewed Revel Casino surveillance submission dated January 17, 2012. Pursuant to N.J.A.C. 13:69D 1.11 b (1) xix, Revel's surveillance department is to maintain an approved submission. Therefore, Revel requested the Division to approve in its entirety, their surveillance submission.

Based on the authority delegated to this office by the Director, Revel Casino surveillance submission is hereby approved.

Within two (2) weeks of the date of this approval letter, please submit two (2) clean copies of the Surveillance Submission with the date of this approval letter noted thereon. Submit to the Division of Gaming Enforcement, Attn. "Regulatory Enforcement Bureau", 4th Floor, 1300 Atlantic Avenue, Atlantic City, NJ 08401.

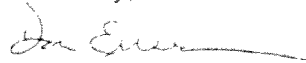


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Tony Weiss
Page 2
January 18, 2012

Sincerely,



Don Errera, Deputy Chief
Regulatory Enforcement Bureau

CC: BEL/DE
Tadd Hansen, DGE
Tom Havey
DGE Intake
O-62-12-004



State of New Jersey

Chris Christie
Governor

Kim Guadagno
Lt. Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Jeffrey S. Chiesa
Attorney General

David Rebuck
Director

March 13, 2012

Frank Fitzpatrick
Executive Director of Security
Revel Casino
500 Boardwalk
Atlantic City, New Jersey 08401

RE: Revel Casino Security Submission-Section I through Section XXII

Dear Mr. Fitzpatrick;

The Division of Gaming Enforcement (Division) has received a Security Submission from Revel Casino dated March 12, 2012, requesting an approval as required pursuant to N.J.A.C 13:69D 1.3 (a) 3.

In Revel's Security Submission referenced above, there are some sections that address departmental standard operating procedures. The Division review focused and concentrated on those areas addressed either by N.J.S.A. ("The Act") and/or N.J.A.C. regulations.

It is noted that on March 8, 2012, the Division approved by letter Section III-1 (Minimum Staffing and Post Assignments). This section of the Submission enabled the department to institute staffing levels in preparation of the test nights and opening.



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Frank Fitzpatrick

Page 2

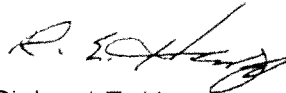
March 13, 2012

Upon review, based upon the authority delegated to this office by the Director, the Division hereby approves Revel Casino's Security Submission..

Within two (2) weeks of the date of this approval letter, please submit two (2) clean copies of the Security Submission with the date of this approval letter noted thereon to the Division of Gaming Enforcement, Attn. "Regulatory Enforcement Bureau", 4th Floor, 1300 Atlantic Avenue, Atlantic City, NJ 08401.

Should you have any questions regarding this approval, please contact Deputy Chief Don Errera of my staff at 441-7529.

Sincerely,



Richard E. Handzo
Chief of Investigations

C: BEL/
Don Errera, Deputy Chief, REB
Tadd Hansen, Supervisor, REB
Joe Goukler, Supervisor, REB
O-62-12-008

Gaming Equipment

Statute and Regulations:

There is a wide assortment of equipment used in gaming operations including, by way of example cards, dice, slot machines and chips. Pursuant to N.J.S.A. 5:12-100, casino licensees may possess such equipment in certain restricted areas approved by the Division. N.J.A.C. 13:69C-7.4 requires each casino licensee to file with the Division a comprehensive list of its table games, slot machines and bill changers as well as equipment used to count and store cash, tokens, checks, gaming vouchers and other items of value used in wagering.

Gaming equipment also includes computerized slot data systems, casino management systems, table games systems and gaming voucher systems. N.J.A.C. 13:69E-1.28 requires that all such systems be tested and approved by the Division so as to insure the integrity of the systems.

Revel Action and Compliance

Revel was required by N.J.S.A. 5:12-100(d) to obtain approval of the design of its gaming chips, both value and non-value. Revel submitted prototypes of its gaming chips to the Division for review and approval and, by letters dated January 25, 2012, those chip designs were approved. Revel represents, and the Division has confirmed, that the chips have been delivered to the Revel facility in sufficient quantities to support gaming operations.

Revel represents that it will not utilize gaming plaques at the time gaming operations commence.

As required by N.J.S.A. 5:12-100(e), Revel has provided to the Division a proof/prototype of its "Gaming Guide" pamphlet. Revel has represented that copies of the "Gaming Guide" will be available to patrons.

As required by N.J.S.A. 5:12-100(f), Revel has provided to the Division a proof/prototype of its signage related to minimum and maximum wagers at its gaming tables and that signage has been reviewed and approved by the Division.

Revel has represented that it will not be utilizing any slot tokens in its gaming operations at the time gaming operations commence. Accordingly, no analysis related to slot tokens was undertaken.

Revel provided to the Division schematic design prototypes for its several gaming layouts. The gaming layouts have been installed by Revel and inspected by the Division.

Revel has provided, as required by N.J.A.C. 13:69C-7.4(a)1, a master list its table games including designations as to Pit Number, Table Number and Serial Number.

Revel has provided, as required by N.J.A.C. 13:69C-7.4(a)2, a master list of its slot machines including designations of location, asset number, model and serial number, denomination and manufacturer.

Revel has received approval of its gaming voucher paper stock as required by N.J.A.C. 13:69E-1.20 et seq.

Conditions and exceptions:

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-100, N.J.A.C. 13:69C-7.4, and N.J.A.C. 13:69E-1.28 and the Division's inspection, test or other review, the gaming equipment to be utilized by Revel is APPROVED, subject to the following conditions and/or exceptions:

1. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its computerized slot data system is stable and functional so as to support gaming operations, as required by N.J.A.C. 13:69e-1.28, prior to or during any test period.

2. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its computerized casino management system is sufficiently stable and functional so as to support gaming operations, as required by N.J.A.C. 13:69e-1.28, prior to or during any test period.
3. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its computerized gaming voucher system is sufficiently stable and functional so as to support gaming operations, as required by N.J.A.C. 13:69e-1.28, prior to or during any test period.
4. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its computerized table game system is sufficiently stable and functional so as to support gaming operations, as required by N.J.A.C. 13:69e-1.28, prior to or during any test period.
5. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the count room and the counting equipment therein is secure and/or functional so as to support gaming operations prior to or during any test period.
6. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the gaming equipment and other items related to gaming operations (i.e. chip carriers, drop boxes) it possesses is secure and/or functional so as to support gaming operations prior to or during any test period.
7. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has sufficient quantities of gaming equipment and other items related to gaming operations (i.e. chip carriers, dealing shoes) to support gaming operations prior to or during any test period.
8. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has posted signage visible to the public, related to prohibitions regarding underage gaming and the possession of firearms, and gaming minimum and maximums prior to or during any test period.

9. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has available, and in sufficient quantities, gaming guides for distribution to the public prior to or during any test period.

10. Any modification or revision to the representations or submission made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition additional or modified conditions.



State of New Jersey

Chris Christie
Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Jeffrey S. Chiesa
Attorney General

Kim Guadagno
Lt. Governor

David Rebuck
Director

January 25, 2012

Mary Helen Medina
Senior Vice President and General Counsel
Revel Entertainment Group
1301 Atlantic Avenue, Suite 200
Atlantic City, New Jersey 08401

RE: Gaming Partners International USA, Inc and Revel Entertainment Group, LLC (Revel) Petition #3481102-Approval for Paulson Chip, primary rack of (\$1.00, \$2.50, \$5.00, \$25.00, \$100.00, \$500.00, \$1,000.00, \$5,000, \$10,000) and back up rack(secondary set) of (\$25.00, \$100.00, \$500.00, \$1,000, \$5,000, \$10,000) value gaming chips.

Dear Ms. Medina;

The staff of the Division of Gaming Enforcement's (Division's) Regulatory Enforcement Bureau has reviewed the sample set of value gaming chips manufactured by Gaming Partners International USA, Inc. received in this office on January 18, 2012. Specifically, Revel Casino is seeking an approval of their primary and secondary sets of value gaming chips.

A review of Petition #3481102 and their exhibits that included: Schematic design information showing front, back and edge design features of each denomination of value chip, primary and secondary color information of each denomination of value chip, specifications as to chip inlay, chip diameter including separate diameter information for chips having denominations of \$1,000.00, \$5,000.00 and the new \$10,000 chip, permanent casino name "Revel" and "Atlantic City" located in the center, value on both the front and back of each value chip and information as to graphics and other measures



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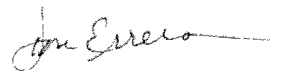
Mary Helen Medina
Page 2
January 25, 2012

designed to prevent counterfeiting of each value chip. The Division's review found these items to be acceptable.

Based upon a physical review and analysis of sample chips submitted to the Division and having conducted a physical inspection of the sample chips utilizing a Closed Circuit Television System, the primary and secondary value chips for Revel Casino are acceptable for use.

Should you have any questions regarding the foregoing, please contact Bruce Ladd or Tadd Hansen of my staff at (609) 441-7529.

Sincerely,



Don Errera, Deputy Chief
Regulatory Enforcement Bureau

CC: BEL/DE
Charles Kimmel, DAG
Tom Havey, DGE
Joe Nicosia
Ford Palmer
Jo-Ann Hacker
Laura McAllister Cox, GPI
Jane Jacaruso, GPI
O-62-12-007



State of New Jersey

Chris Christie
Governor

Kim Guadagno
Lt. Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Jeffrey S. Chiesa
Attorney General

David Rebuck
Director

January 25, 2012

Mary Helen Medina
Senior Vice President and General Counsel
Revel Entertainment Group
1301 Atlantic Avenue, Suite 200
Atlantic City, New Jersey 08401

RE: Gaming Partners International USA, Inc and Revel Entertainment Group, LLC (Revel)
Petition #3481101- Approval for eleven (11) Bud Jones non-value roulette chips, inlay
numbers referenced as 1-11.

Dear Ms. Medina;

The staff of the Division of Gaming Enforcement's (Division's) Regulatory Enforcement Bureau has reviewed the sample set of non-value gaming chips manufactured by Gaming Partners International USA, Inc. received in this office on January 18, 2012. Specifically, Revel Casino is seeking an approval of their non-value gaming chips for roulette.

A review of Petition #3481101 and their exhibits that included: schematics showing the complete design, color and wording ("Revel, Roulette and Atlantic City") that is contained on both sides of every chip within each set of non-value roulette chip as well as on the edges of each chip so that one is able to determine via CCTV the specific style of the non-value chip. The Division's review found these items to be acceptable.

Based upon a physical review and analysis of sample non-value chips submitted to the Division and having conducted a physical inspection of the sample chips utilizing a



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Mary Helen Medina
Page 2
January 25, 2012

Closed Circuit Television System, the non-value chips for Revel Casino are acceptable for use.

Should you have any questions regarding the foregoing, please contact Bruce Ladd or Tadd Hansen of my staff at (609) 441-7529.

Sincerely,



Don Errera, Deputy Chief
Regulatory Enforcement Bureau

CC: BEL/DE
Charles Kimmel, DAG
Tom Havey, DGE
Joe Nicosia
Ford Palmer
Jo-Ann Hacker
Laura McAllister Cox, GPI
Jane Jacaruso, GPI
O-62-12-008

CREDIT

Statute and Regulations:

N.J.S.A. 5:12-101 establishes the requirements for, and the standards by, which casino licensees may issue credit to patrons. The requirements include the establishment of patron accounts and the process by which a patron's identity is established prior to the issuance of credit, as set forth in N.J.A.C. 13:69D-1.27. The regulatory structure, at N.J.A.C. 13:69D-1.27A, also permits patrons to request that their credit privileges be suspended.

The regulations, at N.J.A.C. 13:69D-1.27B, also establish a protocol for the issuance of credit by electronic means. The prototype for this process, known as "E-marker", has been approved by the Division subject to a field test.

Further, the statute and regulations impose certain recordkeeping and reporting requirements on casino licensees, including the requirement to report credit activity by certain enumerated governmental officials. N.J.S.A. 5:12-99(a)17.

Revel Action and Compliance:

Revel has filed with the Division internal control procedures, required by N.J.S.A. 512-101(a)2 and (b)4, which procedures have been reviewed by the Division.

Revel has filed with the Division internal control procedures, required by N.J.S.A. 512-101(j), whereby a patron may request a suspension of credit privileges, which procedures have been reviewed by the Division.

Conditions and Exceptions:

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-101, N.J.A.C. 13:69D-1.27, N.J.A.C. 13:69D-1.27A and

N.J.A.C.13:69D-1.27B, and the Division's inspection, test or other review, the internal controls and computer systems to be utilized by Revel in the granting of credit are APPROVED, subject to the following conditions and/or exceptions:

1. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the personnel employed by Revel and assigned to the credit department, or functional equivalent, are trained in and proficient with the policies and procedures as set forth in the internal controls related to credit and the extension of credit prior to or during any test period.
2. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the personnel employed by Revel and assigned to the credit department, or functional equivalent, are trained and proficient in the process by which patron accounts are established prior to or during any test period.
3. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the personnel employed by Revel and assigned to the credit department, or functional equivalent, are trained and proficient in the procedures by which patron checks are processed prior to or during any test period.
4. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the list of persons who have requested a suspension of credit privileges has been entered into its computer system and business records prior to or during any test period.
5. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has established procedures by which it identifies persons required to be reported to the Division, pursuant to N.J.S.A. 5:12-99(a)17, prior to or during any test period.
6. Revel shall demonstrate to the satisfaction of the Division, by inspection,

test or otherwise, that its personnel assigned to credit functions are trained and can fulfill the requirements of N.J.S.A. 5:12-101.

7. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has established procedures and trained its personnel so as to adequately operate an E-marker system as permitted by N.J.A.C. 13:69D-1.27B, prior to or during any test period.

8. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.

COMPLIMENTARIES

Statute and Regulations:

Casino licensees may offer complimentary good and services to patrons pursuant to N.J.S.A. 5:12-102. If complimentary good and services are provided to patrons, casino licensees are required, pursuant to N.J.A.C. 13:69D-1.9, to maintain certain records related to the complimentary items issued and to file certain reports. Also pursuant to N.J.A.C. 13:69D-1.9, a casino licensees may offer complimentary goods and services individually or as part of a marketing program. The terms and conditions of any such promotional program are required to be filed with the Division and maintained at the licensed premises.

Revel Action and Compliance

Revel has filed with the Division internal controls describing the procedures required by N.J.A.C. 13:69D-1.9(b) and the process by which it will file a summary of complimentaries provided to patrons pursuant to N.J.A.C. 13:69D-1.9(f)

Revel has developed the database required by N.J.A.C. 13:69D-1.9(d).

Conditions and Exceptions

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-102 and N.J.A.C. 13:69D-1.9, and the Division's inspection, test or other review, the policies and procedures by which complimentary goods and services will be offered, either individually or as part of a marketing program, are APPROVED, subject to the following conditions and/or exceptions:

1. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has established a list of employees authorized to issue complimentaries, and the level of authority of each such employee, as required by

N.J.A.C. 13:69D-1.9(b)1, prior to or during any test period.

2. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has established procedures to accurately maintain records and information related to the issuance of complimentaries to patrons, as required by N.J.A.C. 13:69D-1.9(d), prior to or during any test period.

3. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has developed a database for the complimentaries it issues, as required by N.J.A.C. 13:69D-1.9(d), prior to or during any test period.

4. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that it has established procedures to accurately report the issuance of complimentaries to certain governmental employees, as required by N.J.S.A. 5:12-102(m), prior to or during any test period.

5. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.

Casino Hotel Alcoholic Beverage

Statute and Regulations:

The Casino Control Act vests responsibility for the regulation of alcoholic beverages, including the purchase, possession, storage and sale of alcoholic beverages, with the Division. N.J.S.A. 5:12-103.

Revel Action and Compliance

Revel has submitted blueprints depicting the locations of the proposed CHAB outlets and has submitted a listing describing each outlet, which listing specifies, for each outlet, the source of alcoholic beverages, the location of the area where those beverages will be served, and the type of authorization requested. The Division has reviewed and approved the submissions.

Based upon the submissions of Revel, the Division issued Order PRN 0121202 dated February 27, 2012 granting CHAB license 3333-00-064-001 to Revel. That Order includes three conditions: the issuance of a casino license to Revel by the Casino Control Commission, a physical inspection of the outlets by the Division prior to the outlets' use for the storage and distribution of alcoholic beverages, and the submission by Revel to the Division of any changes to its CHAB outlets.

Conditions and Exceptions:

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-103, and the Division's inspection, test or other review test or other review of Revel's facility, Revel's authority to purchase, sell, possess and distribute is APPROVED, subject to the following conditions.

1. Revel shall demonstrate, to the satisfaction of the Division, by test, inspection or otherwise, that the design and construction of the areas designated on its floor plan for the storage of alcoholic beverages are secure prior to the receipt of any alcoholic beverages either prior to or during the test period.

2. Revel shall demonstrate, to the satisfaction of the Division, by test, inspection or otherwise, that those employees who will dispense alcoholic beverages are properly trained to identify persons under the age of 21 and/or are apparently or actually intoxicated, during any test period.

3. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.

STATE OF NEW JERSEY
Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement

_____)
In the Matter of the Amended and Restated)
Petition of Revel Entertainment Group, LLC,)
and Its Holding Companies, Intermediary)
Companies and Subsidiaries For the Casino)
Licensure of Revel Entertainment Group, LLC)
and For Various Rulings In Connection Therewith)
_____)

ORDER
PRN 0121202
(Issuance of CHAB License)

By its Amended and Restated Petition (PRN 0121202) dated February 20, 2012, Revel Entertainment Group, LLC ("Revel") and its holding companies, intermediary companies and subsidiaries filed an application for casino licensure and for various rulings in connection therewith. One of the rulings being sought is the issuance by the Division of Gaming Enforcement of a Casino Hotel Alcoholic Beverage ("CHAB") license to Revel granting it the authority to purchase, possess, store, sell and allow the consumption of alcoholic beverages within the casino hotel facility and,

In its Amended and Restated Petition, at paragraph 39, subparagraph (g) Revel, in furtherance of its request for a CHAB license, has offered a narrative and blueprints of the proposed outlets for which Revel seeks CHAB authorization within the proposed casino hotel facility, and the narrative and blueprints have been reviewed by the Division of Gaming Enforcement for compliance with the regulations and,

Having considered the relevant provisions of the Casino Control Act, *N.J.S.A. 5:12-1 et seq.*, specifically *N.J.S.A. 5:12-103*, and the Division of Gaming Enforcement's review having determined that Revel's proposed CHAB licensed facility is in compliance with the regulations at *N.J.A.C.*

13:691-1.1 *et seq.*, and pursuant to the Division of Gaming Enforcement's authority to issue a CHAB license under the aforementioned statutory authority,

IT IS ORDERED that the request be granted and that Revel be issued a CHAB license, number 3333-00-064-001, with the following conditions:

1. From the date of this Order, Revel is authorized to purchase alcoholic beverages from New Jersey licensed wholesalers/distributors and store those alcoholic beverages within those locations of its casino hotel facility designated by Revel in its submission to the Division of Gaming Enforcement for the storage of such beverages. Revel is not permitted to sell or otherwise provide those beverages for consumption by individuals until Revel is issued a casino license by the Casino Control Commission.
2. This approval is subject to a prior on-site inspection by the Division of Gaming Enforcement of the aforementioned CHAB outlets and the determination by the Division of Gaming Enforcement that such outlets comply with the regulatory requirements attendant to CHAB licensure.
3. The authorized CHAB outlets will be the same location and Type (I, II, III, IV and V) as indicated in the submission to the Division of Gaming Enforcement on February 21, 2012. Any changes in location and/or Type to the existing CHAB outlets, in addition to any name change by which those outlets will be referenced in the CHAB license, are to be submitted to the Division of Gaming Enforcement for appropriate amendment to Revel's CHAB license.

Dated:

February 27, 2012



DAVID L. REBUCK
DIRECTOR

Equal Employment Business Opportunity Plan ("EEBOP")

Statute and Regulations:

The Casino Control Act, at N.J.S.A. 5:12-134, requires casino licensees to afford equal employment opportunities to all prospective employees consistent with the Law Against Discrimination, N.J.S.A. 10:5-1 et seq. To this end, casino licensees are required, pursuant to N.J.A.C. 13:69K-6.1, to submit to the Division for approval a plan to accomplish these goals. Any such plan must include a statement by the Chief Executive Officer, N.J.A.C. 13:69K-6.2(a)1, stating a commitment to adhere to the policies of the plan, and, further, pursuant to N.J.A.C. 13:69K-6.2(b), must delineate available resources and procedures to implement the plan.

Revel Action and Compliance

Revel submitted its EEBOP to the Division on February 3, 2012, as amended on February 27, 2012. In support of its EEBOP, and in compliance with statutory and regulatory requirements, Revel also submitted, on February 27, 2012, a Certification by Revel's Chief Executive Officer and President Kevin DeSanctis acknowledging Revel will conduct its business according to the terms and conditions of its EEBOP. Revel provided to the Division, on March 5, 2012, an excerpt of its policies and procedures through which Revel's employees will be advised of the policy and enforcement of the EEBOP.

Based upon the aforementioned submissions of Revel, the Division issued Order PRN 0121202 dated March 9, 2012 approving Revel's EEBOP.

Conditions and Exceptions

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-134, N.J.A.C. 13:69K-6.1 and 2, and the Division's inspection, test or other review of the filings and submissions, Revel's EEBOP plan is APPROVED, subject to the following conditions and/or exceptions:

1. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the personnel employed by Revel and assigned to each department are trained in the policies and procedures as set forth in EEBOP submitted and approved as above, either prior to or during the test period.

2. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.

STATE OF NEW JERSEY
Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement

In the Matter of the Amended and Restated)
Petition of Revel Entertainment Group, LLC,)
and Its Holding Companies, Intermediary)
Companies and Subsidiaries For the Casino)
Licensure of Revel Entertainment Group, LLC)
and For Various Rulings In Connection Therewith)
_____)

ORDER
PRN 0121202
(Approval of EEBOP)

By its Amended and Restated Petition (PRN 0121202) dated February 20, 2012, Revel Entertainment Group, LLC ("Revel") and its holding companies, intermediary companies and subsidiaries filed an application for casino licensure and for various rulings in connection therewith. One of the rulings being sought is the approval by the Division of Gaming Enforcement ("Division") of Revel's equal employment business opportunity plan ("EEBOP") and,

In furtherance of the approval sought from the Division, Revel submitted its EEBOP on February 3, 2012, with revised version submitted on February 27, 2012. In support of its EEBOP, and in compliance with statutory and regulatory requirements, Revel also submitted to the Division, on February 27, 2012, a Certification by Revel's Chief Executive Officer and President Kevin DeSanctis acknowledging Revel will conduct its business according to the terms and conditions of its EEBOP. On March 5, 2012 Revel also filed an excerpt of its policies and procedures, accessible by all Revel employees, which provides notification to its employees of the tenets of Revel's policy expressed in its EEBOP and describes procedures for seeking redress if an employee perceives a violation of that policy.

Having considered the relevant provisions of the Casino Control Act, *N.J.S.A. 5:12-1 et seq.*, specifically *N.J.S.A. 5:12-134*, and the Division's review having found Revel's proposed EEBOP, the Certification by Revel's Chief Executive Officer and President Kevin DeSanctis, and Revel's implementing policies and procedures, consistent with *N.J.S.A. 5:12-134* and the regulations at *N.J.A.C. 13:69K-1.1 et seq.*, pursuant to the Division's statutory authority under *N.J.S.A. 5:12-134c*,

IT IS ORDERED that the EEBOP, Certification of Kevin DeSanctis and the policies and procedures submitted by Revel are approved as consistent with the requirements of *N.J.S.A. 5:12-134*.

Dated: March 9, 2012

A handwritten signature in dark ink, appearing to read "David L. Rebeck", written over a horizontal line.

DAVID L. REBUCK
DIRECTOR

EXCLUSION and SELF-EXCLUSION

Statute and Regulations

N.J.S.A. 5:12-71 establishes an exclusion list whereby casino licensees are required to exclude certain individuals from their casino premises. The list of excluded persons is to be maintained by the Division and be made available to each casino licensee. Casino licensees are, pursuant to N.J.A.C. 13:69G-1.7, required to establish procedures by which those persons on the exclusion list are identified and removed from the casino premises.

N.J.S.A. 5:12-71.2 established a list of persons who voluntarily elect to exclude themselves from casino premises. This list, known as the self-exclusion list, is to be maintained by the Division and made available to all casino licensees. As with the exclusion list, each casino licensee is required to establish procedures by which its employees are able to identify self-excluded persons and, upon identification, refuse wagers, withhold promotional mailings and complimentaries and deny credit privileges.

Revel Action and Compliance

Revel has obtained the list of persons who are excluded from licensed casino premises and has entered the information into its computer system. Revel represents that its computer system will cause a computer notification, or "flag", to be generated should any Revel employee access the system to transact business with a person who is to an exclusion order.

Revel has obtained the list of persons who are self-excluded from licensed casino premises and has entered the information into its computer system. Revel has developed and placed on file specific procedures to insure that self-excluded persons are identified and 1) prevented from engaging in gaming activity, 2) denied credit, and 3) not subject to any promotional activity.

Conditions and Exceptions:

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-71 and 71.2(a), and the Division's inspection, test or other review, Revel's computer systems, policies and procedures related to the exclusion or self-exclusion of certain persons are APPROVED, subject to the following conditions and/or exceptions:

1. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the information regarding excluded and self-excluded persons will be continuously updated, either prior to or during any test period.
2. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its computerized notification system is functional as related to excluded and self-excluded persons, either prior to or during any test period.
3. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that those employees who will interact with the exclusion and self-exclusion lists are properly trained to identify an excluded or self-excluded person, either prior to or during any test period.
4. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.

VENDORS and TENANTS

Statute and Regulations:

N.J.S.A. 5:12-92 requires casino licensees to transact business with licensed or registered enterprises and persons. Further, the statute imposes a higher standard on those entities intending to deal in gaming related items or services and, in the absence of a license and pursuant to N.J.S.A. 5:12-92(a)1, any such entity can only transact business pursuant to a transactional waiver issued by the Director. Pursuant to N.J.S.A. 5:12-92(c), non-gaming entities, including tenants within the licensed premises, are required to be registered prior to conducting any business.

To address integrity issues, casino licensees are required to register their vendors and report all business transactions with those vendors to the Division. N.J.A.C. 13:69C-10.1. Casino licensees are also required, pursuant to N.J.A.C. 13:69C-10.2, to maintain copies of any written agreement, including leases with in-house tenants, which are available to the Division for review.

Further, entities which have been found unsuitable are considered "prohibited vendors" and casino licensees are precluded from transacting business with any prohibited vendor. N.J.A.C. 13:69C-10.1(d). A list of prohibited vendors is maintained by the Division and is available to the several licensees.

Casino licensees are also required, pursuant to N.J.A.C. 13:69c-10.6, to file, on a monthly basis, a record of all transactions that it has engaged in, including the identity of the vendor and the dollar value of the transactions.

Revel Action and Compliance:

Revel has represented, and the Division has confirmed, that it has purchased various items of gaming equipment from enterprises which are licensed or registered pursuant to N.J.S.A. 5:12-92(a), or which have applied for licensure pursuant to N.J.S.A. 5:12-92(a) and have been granted transactional waivers.

Revel has represented and the Division has confirmed that, as required by N.J.A.C. 13:69C-10.2(a)3, it has provided to the Division copies of leases it has entered into with enterprises which are either registered pursuant to N.J.S.A. 5:12-92(c), including but not limited to, leases with entities which will be providing food and/or beverage service to patrons, or which have applied for licensure pursuant to N.J.S.A. 5:12-92(a) and have been granted transactional waivers.

Revel has entered into certain leases with and has provided the leases to the Division.

Revel has provided and continues to provide information required pursuant to N.J.A.C. 13:69C-10.1 and 10.6, related to the purchase of goods and services and the disbursement of funds.

Conditions and Exceptions:

Based upon the submissions filed by Revel with respect to each of the items required by N.J.S.A. 5:12-92 and N.J.A.C. 13:69C-10.1 et. seq., and the Division's inspection, test or other review, Revel's computer systems, policies and procedures related to business transactions with persons and entities are APPROVED, subject to the following conditions and/or exceptions:

1. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the list of prohibited vendors, N.J.A.C. 13:69C-10.1 (c) and (d), has been filed and is maintained within its computerized business records.

2. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that its systems, policies and procedures are adequate to prevent it from transacting business with any prohibited vendor.

3. Revel shall demonstrate to the satisfaction of the Division, by inspection, test or otherwise, that the personnel employed by Revel and assigned to specific departments involved with purchasing and disbursement are trained in and proficient with the systems, policies and procedures as set forth in the internal controls regarding the registration of vendors and the prohibition against conducting business with prohibited vendors.

4. Any modification or revision to the representations or submissions made by Revel shall be promptly filed in writing with the Division prior to any test period. Any such modifications or revisions may result in a suspension of this Conditional Operation Certificate and/or the imposition of additional or modified conditions.